

Arnold & Porter

John F. Hagan, Jr.
+1 312.583.2370 Direct
John.Hagan@arnoldporter.com

September 22, 2022

VIA ECF

The Honorable Denise L. Cote
United States District Court Judge
Southern District of New York
500 Pearl Street, Room 1910
New York, New York 10007

Re: ***American GreenFuels Rockwood (Tennessee), LLC v.
Aik Chuan Construction Pte. Ltd., No. 21-CV-7680 (DLC)***

Denise L. Cote
Denise Cote
9/22/22

Dear Judge Cote:

We represent Defendant/Counterclaim Plaintiff Aik Chuan Construction Pte. Ltd. ("Aik Chuan") in the above-captioned matter. We write on behalf of Aik Chuan and Plaintiff/Counterclaim Defendants American GreenFuels Rockwood (Tennessee), LLC and Kolmar Americas, Inc. (together, the "Counterclaim Defendants") to jointly request an adjournment of the pretrial conference scheduled for Thursday, September 29, 2022 at 3:00 p.m., wherein the parties are scheduled to discuss, *inter alia*, a discovery schedule for this matter. (Pretrial Conference Order, ECF No. 52).

Prior to the reassignment of this case to Your Honor, the Counterclaim Defendants filed two motions to dismiss, which are now fully briefed. (*See* Mots., ECF Nos. 37-41; Aik Chuan Opp'ns, ECF Nos. 46 & 47; Replies, ECF Nos. 50 & 51). Because we believe that the Court's ruling on the Counterclaim Defendants' motions to dismiss may materially impact the extent of and schedule for discovery in this case, we respectfully request that the pretrial conference currently scheduled for September 29, 2022 be adjourned to either of the two Fridays that follow the Court's forthcoming decision on those motions.

We thank the Court for its attention to this matter.

Respectfully Submitted,

/s/ John F. Hagan, Jr.
John F. Hagan, Jr.

cc: Counsel for Counterclaim Defendants (*via ECF*)